

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

UNITED STATES OF AMERICA) Magistrate's Case No. 17-1634MJ
)
Plaintiff,) COMPLAINT FOR VIOLATION OF
) 21 USC § 841
vs.) Possession a Controlled Substance
) With Intent to Distribute
Ivan Gonzalez) Count One
Defendant)
YOB: 1994) 21 USC § 952, 960, and 963
) Importation of a Controlled
United States Citizen) Substance
) Count Two

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNT ONE

On or about July 4, 2017, in Yuma, Arizona, within the District of Arizona, the defendant, Ivan Gonzalez, did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(i).

COUNT TWO

On or about June 29, 2017, in San Luis, Arizona, within the District of Arizona, the defendant, Ivan Gonzalez, did knowingly and intentionally import a mixture or substance containing a detectable amount of heroin a Schedule I Controlled Substance, into the United States from the Republic of Mexico, in violation of Title 21, United States Code, Sections 952, 960 and 963.

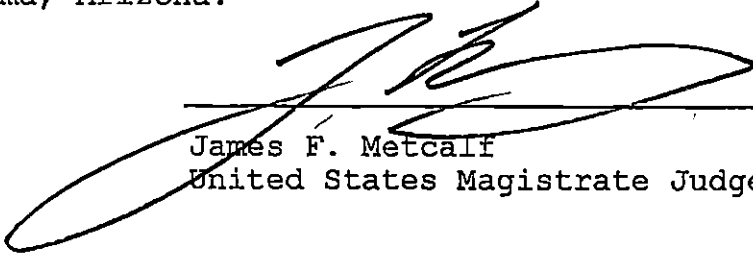
And the complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Reviewed by: AUSA Joshua Kolsrud



Daniel Cayton
Special Agent - Drug Enforcement
Administration

Sworn to before me and subscribed in my presence, August 21, 2017, at Yuma, Arizona.



James F. Metcalf
United States Magistrate Judge

UNITED STATES OF AMERICA

vs.

GONZALEZ, Ivan

STATEMENT OF FACTS

I, Daniel Cayton, being duly sworn, do state the following:

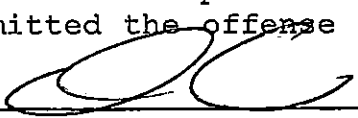
The following events occurred on July 4, 2017, at or near the United States Border Patrol Interstate 8 East Checkpoint in Yuma, Arizona, within the District of Arizona.

July 4, 2017, Ivan Gonzalez, a US citizen, a passenger of an Express Shuttle shuttle van, approached United States Border Patrol fixed Immigration Checkpoint at Mile Marker 17 in between Yuma and Wellton. Border Patrol Agents conducted a routine immigration-related query of the car's occupant. After a Narcotics Detection Dog (NDD) alerted to the vehicle, Gonzalez and the shuttle van were sent to the checkpoint's secondary area for further investigation and examination.

A search of Gonzalez's personal baggage yielded the discovery of drugs. Within this baggage, one package was discovered. The contents of the package were field-tested, producing positive results for the presence of heroin.

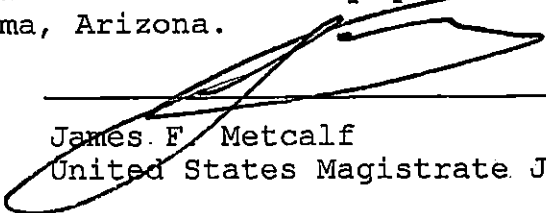
In a subsequent, post-Miranda interview with Drug Enforcement Administration Special Agents, Gonzalez acknowledged that he was transporting drugs for currency, invoking his right to counsel.

Based on the foregoing, there is probable cause to believe that the Defendant committed the offense as alleged in the Complaint.



Daniel Cayton
Special Agent - Drug Enforcement
Administration

Sworn to before me and subscribed in my presence, August
of 21, 2017, at Yuma, Arizona.



James F. Metcalf
United States Magistrate Judge